



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

May 9, 2022

BY ECF

Hon. Edgardo Ramos
United States District Judge
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *ACLU et al. v. Customs and Border Protection et al.*, 21 Civ. 10430 (ER)

Dear Judge Ramos:

This Office represents the defendant agencies in the above-referenced action brought under the Freedom of Information Act (“FOIA”). Pursuant to the Court’s order at the initial conference, I write respectfully to provide the Court with a status report regarding the agencies’ searches and productions in this case.

Federal Aviation Administration: already completed its production

Customs and Border Protection: expects to make its first production by the end of July, with possible monthly productions thereafter

Immigration and Customs Enforcement: anticipates that it will complete its productions by the middle of June

U.S. Secret Service: expects to complete its searches by the end of June, and is also currently reprocessing one document, which it also expects to be complete before the end of June

Federal Protective Service: will not be making productions in this case as it has no responsive documents

Federal Bureau of Investigation: expects to complete its searches by early August, and is currently processing a single policy document, which it expects will be completed by the end of June

Drug Enforcement Administration: anticipates that it will make a single production of responsive documents by the end of June

U.S. Marshals Service: anticipates that it will make its first production around the end of May, and will complete its productions by the end of August

The parties will make their next monthly status report on June 9, 2022. We thank the Court for its consideration of this matter.

Respectfully,

DAMIAN WILLIAMS
United States Attorney

By: s/Jean-David Barnea
JEAN-DAVID BARNEA
LUCAS ISSACHAROFF
Assistant United States Attorneys
Telephone: (212) 637-2679/2737
Email: Jean-David.Barnea@usdoj.gov
Lucas.Issacharoff@usdoj.gov

cc: Counsel for plaintiffs (by ECF)